

unfortunately, after making approximately \$100,000 in mortgage payments, I fell behind on my monthly mortgage payments, of \$5,090.72 with an interest rate of 5.99%.

5. My mortgage and promissory note has changed hands several times and I have been unable, to modify my high interest mortgage, despite my best efforts.
6. Recently, I have been negotiating with Selene Finance, LP, agent of Defendant, to temporarily modify my mortgage, or to reinstate my mortgage. I sent Selene a counteroffer to a temporary mortgage modification offer that they sent me; and offered to pay significantly more than the initial \$850,000 loan.
7. Korde & Associates, P.C., agent for Defendant, responded to my counteroffer to Selene Finance, L.P., by sending me six (6) letters in one day, announcing that my home was to be sold at a 2:00 PM, May 15, 2019 auction sale.
8. I believe that my case against Wilmington is very strong and that I will prevail at a trial on the Merits.
9. My home is located on property that is unique, sacred, and has great significance to me, my family, and to older members of the Wampanoag Tribe of Aquinnah, who will be negatively impacted if an auction sale is held on May 15, 2019.
10. I am negotiating in good faith to modify my mortgage loan and Defendant will also be so motivated, if they are enjoined from holding an auction sale on May 15, 2019.
11. If Defendant is allowed to foreclose on my home, my family and I will suffer immediate and irreparable harm.

Signed under the pains and penalties of perjury this 7TH day of May 2019:

“/s/”Matthew Vanderhoop